Department of Energy
Washington, DC 20585

February 23, 2011

Mr. Mark Malinowski, P.G.
Performance Manager
Santa Susana Field Laboratory Project
Department of Toxic Substances Control
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Re: 2010 Administrative Order on Consent Interpretation Concurrence

Dear Mark:

The purpose of this letter is to seek Department of Toxic Substances Control (DTSC) concurrence for the agreed upon path forward for the chemical co-located sampling in Area IV and the Northern Undeveloped Land of the Santa Susana Field Laboratory (SSFL) and to document the approval process.

The US Environmental Protection Agency (EPA) is conducting an extensive radiological characterization survey in Area IV and the Northern Undeveloped Land. The soil sampling portion of this survey began on October 18, 2010. At that time, and with the approval of DTSC, DOE began to collect chemical co-located samples at every location that EPA selected. The 2010 Administrative Order on Consent for Remedial Action (Docket No. HSA-CO 10/11-037) describes this chemical co-located sampling effort in two sections:

> *Section 2.5.1. Phase 1: Co-located Samples. In conjunction with samples collected by U.S. EPA for radiological analyses during its first phase of sampling, at every location where U.S. EPA collects a sample for radiological analyses, DOE shall cause to be taken a similar sample from the same or proximate locations.*
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> *Section 2.5.2 Phase 2: Co-located Samples from Random Locations. In conjunction with samples collected from randomly selected locations by U.S. EPA for radiological analyses during its second phase of sampling, at every location where U.S. EPA collects a sample for radiological analyses, DOE shall cause to be taken a similar sample from the same or proximate locations.*

Working collaboratively with technical staff from DTSC, DOE developed a set of decision criteria to make technical recommendations to "de-select" some locations for the chemical co-located sampling effort. DTSC discussed the decision criteria at a meeting with stakeholders on February 2, 2011 and revised to reflect stakeholder input.

Chemical Co-located Sampling Decision Criteria

The default for all proposed chemical co-located sampling will be to sample at every location; however, discretionary sampling decisions may be made based on three scenarios:

A. Scenario #1: "Clearly contaminated" area that will require cleanup discretionary sampling criteria. The potential discretionary decision is to not collect chemical samples at some EPA locations where sufficient chemical data already exists to define the area as one that is clearly contaminated and will likely be remediated. Co-located sampling will still be conducted near the areas, as needed, to adequately define extent of contamination.

   a. "Clearly contaminated" are those areas that have been previously sampled and sampling results show detected chemical concentrations that obviously exceed current background and or Method Reporting Limits (MRLs)
   b. There are a high frequency and number of chemical constituents that exceed background and MRL
   c. DOE agrees to cleanup of contaminated area

B. Scenario #2: High-density radiological sampling area due to elevated gamma survey results discretionary sampling criteria. Potential discretionary decision: do not collect chemical samples at some EPA locations so that sample spacing is consistent with RCRA Feasibility Investigation (RFI) approach (~50 to 100 feet).

   a. No known and/or identified chemical operations and/or releases (subject to field observations)
   b. Non-point source, no preferential pathways identified, open/flat area
   c. Site is sufficiently distant from known potential chemical sources

C. Scenario #3: High-density radiologic sampling of historic features discretionary sampling criteria. Potential discretionary decision: using professional judgment, do not collect chemical samples at some EPA locations so that sample spacing is consistent with RFI approach.

   a. Feature has known chemical and or radiologic impacts, and or identified data gaps
   b. Targeted sampling density should be based on feature characteristics and historical use (e.g., holdup tanks, septic tanks, sumps, test areas, etc.)

Approval Process for Chemical Co-located Sampling documents

Starting on October 18, 2010, the chemical co-located sampling effort has necessitated several documents that DTSC has quickly approved. As EPA conducts soil sampling throughout Area IV and the Northern Undeveloped Land, they have divided the site into various sub areas. To continue this fast-paced forward movement, DOE proposes the following hierarchy of document approvals:

A. The Master Field Sampling and Analysis Plan has been revised and was recently re-submitted and approved on February 17, 2011. It may be revised in the future as field conditions and sampling approaches change. For each revision, DOE will informally discuss and review changes with DTSC, and upon agreement will formally send, via letter, the revised Master Field Sampling Plan to DTSC for approval.

B. To support preparation of each sub-area Addendum to the Master Field Sampling and Analysis Plan, as soon as DTSC receives the EPA GIS layers for EPA's proposed surface and sub-surface soil sampling locations and the GIS layers for the results from the gamma scanning, geo-physical logging, and features analysis for each EPA sub-area, DTSC will send the information to the DOE team.

C. DTSC and the DOE team will carefully review all materials sent by EPA, previous RFI sampling results, previous DTSC and public comments and determine using the decision criteria the selection of chemical co-located samples for each sub-area.

D. The DOE team will prepare GIS maps and descriptions and justifications that identify sampling locations to be "de-selected" and "clearly contaminated areas that will likely be remediated". This information will be sent in draft form via email to DTSC.

E. After incorporations of DTSC's comments, DOE will send via email the final documents and, if DTSC concurs, DTSC will send an email to EPA with DOE's email and materials and recommendations. If DTSC does not concur, then DOE and DTSC will resolve comments and forward again to DTSC for transmittal after DTSC approval to EPA.

F. The DOE team will prepare addendums to the Master Field Sampling and Analysis Plan for each EPA sub-area. Justifications for reduction in co-located sampling density and areas that have been designated as clearly contaminated will be noted in the addendums.

G. The addendums will be sent to DTSC via email first in draft form for comment and after comments have been resolved to DTSC for approval.

H. DTSC will approve the sub-area addendum via email. Once the addendum has been approved, DTSC will post the addendum and the approval email on their website, send to EPA for placement on their website and also send to DOE for placement on DOE's website.

I. At each EPA sub-area technical work group meeting. DTSC and DOE will discuss the plans for each EPA sub-area for chemical co-located sampling and the decisions made regarding reduction in sample density.

DOE seeks DTSC's concurrence that Section 2.5.1 and 2.5.2 can be implemented as described in the decision criteria and concurrence that the process for approvals is appropriate and complete.

Sincerely,

Richard Schassburger,
Federal Project Director

cc: Rick Brausch, DTSC
Laura Rainey, DTSC
Stephie Jennings, DOE
Craig Cooper, EPA
John Wondolleck, CDM